

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2019-226-E
DOCKET NO. 2021-9-E

In re:

South Carolina Energy Freedom Act
(House Bill 3659) Proceeding Related
to S.C. Code Ann. Section 58-37-40 and
Integrated Resource Plans for Dominion
Energy South Carolina, Incorporated

And

Dominion Energy South Carolina,
Incorporated's 2021 Integrated
Resource Plan (IRP)

**SIERRA CLUB'S FIRST SET OF
DATA REQUESTS**

September 9, 2021

Pursuant to R.103-833 of the South Carolina Code of Regulations, Intervenor Sierra Club, by and through undersigned counsel, serves the following data requests on Dominion Energy South Carolina, Inc. ("Dominion" or the "Company") in the above referenced consolidated dockets. These requests are continuing in nature to the extent permitted by the rules of the South Carolina Public Service Commission and the South Carolina Rules of Civil Procedure.

INSTRUCTIONS

1. These requests should be regarded as continuing. If, after filing its initial response to the interrogatories and requests, the Company becomes aware of any information that would alter or amend any responses, please provide updated responses as additional information becomes available.

2. If a response to any of the attached requests requires any calculations, analyses, assumptions, or studies, please identify and provide copies of such calculations, analyses, assumptions, or studies—including all work papers relating thereto. For any analyses or calculations prepared using electronic workbooks, please provide operational versions of those spreadsheets as well as all operational versions of all supporting workbooks used to develop inputs.
3. Produced documents should include originals and all other copies which are not absolutely identical, as well as all drafts and notes (whether typed, handwritten or otherwise) made or prepared in connection with such documents, whether used or not.
4. With respect to requests for analyses or calculations that were prepared using electronic workbooks, please provide operational versions of those spreadsheets (i.e., with calculations active), as well as all operational versions of all supporting workbooks used to develop inputs.
5. Unless otherwise specified, all requests for documents herein pertain to the Company's South Carolina operations. Please ensure that all responses are specific to the Company's South Carolina service territory. Where South Carolina-specific data are not available, please provide an appropriate factor, method, or percentage to allow for an accurate estimate of South Carolina-specific data to be performed.
6. If you consider any document to be privileged or protected from production, then you must:
 - (i) include in your response a list of documents withheld from production, (ii) identify each document by date, addressee, author, title and subject matter, (iii) identify those persons who have seen the document or who were sent copies, and (iv) state the ground(s) upon which each such document is considered privileged or protected.
7. Due to COVID-19 and most people working remotely, please deliver all responses to the following interrogatories and requests for production of documents **electronically** to:

Robert Guild
bguild@mindspring.com

Dorothy E. Jaffe
dori.jaffe@sierraclub.org

DEFINITIONS

1. The “Company” is defined to include both Dominion Energy South Carolina, Inc. and any consultants or other agents that assisted in the development or preparation of the plan for electric distribution grid transformation projects.
2. “Communications” shall mean all oral communications and all written communications, including all “documents,” as defined below.
3. “Describe” means to state in detail each and every basis for the position taken or the statement made in response to the request and includes identifying each and every statement or document relied on and provide a copy of all such identified documents.
4. “Document” is defined to include all materials, of any kind or description, in any medium, regardless of where or how maintained or accessed (such as in or through official work or personal files, accounts, or devices). Documents include, by way of illustration only, correspondences, papers (including working papers), electronic mail (including any attachments), telegrams, facsimiles, notes, sound or video recordings, voice mail, minutes, memoranda, inter- or intra-office communications, diaries, daily logs, records, reports, studies, estimates, surveys, written forecasts, analyses, contracts, licenses, agreements, charts, graphs, indexes, database or other electronic records, statistical records, data sheets, data processing cards, computer printouts, computer discs, videotapes, motion pictures, agendas, meeting invitations, websites, intranet pages, and other electronic communications, any notes or drafts relating to any of the foregoing, and any other documents of any kind in your possession, custody or control, or to which you have access to or know to exist..

5. “Identify,” “identification,” as used with respect to a person means to state the person’s full name and present address and his present or last known employment position and business affiliation if a natural person, and corporate or other status and address if not a natural person. “Identify” or “identity” when used in reference to a document means to state the following as to each document:
- a. Its nature and contents;
 - b. Its date;
 - c. The date it was executed if different from the date it bears;
 - d. The name, address and position of its author or signer;
 - e. The name, address and position of its addressee, if any;
 - f. Its present location and the name, present address and position of the person or persons having present custody; and
 - g. Whether it has been destroyed, and if so, with regard to such destruction; (i) the date of destruction; (ii) the reason for destruction; and (iii) the identity of the person who destroyed the document.
6. “Including” means “including but not limited to.”
7. “Person” includes any individual, sole proprietorship, partnership, corporation, association, trust, statutory trust, joint venture, or other entity.
8. “You” or “your” means the Company and its agents, employees, representatives, attorneys, experts, investigators, insurers, consultants, or anyone acting on behalf of the Company.

DATA REQUESTS

Request No. 1-1. Please provide copies of any interrogatories or other data requests or formal discovery requests served in this proceeding by the Company or any other party or intervenor, when that discovery request is served. If any data request has already been served, please provide a copy of the Company's response to this request. Where available, please provide copies electronically in the native file format. This is an on-going request.

Request 1-2. Please provide copies of any and all responses (including objections) provided by the Company in this proceeding to any data request, interrogatory or request for the production of documents (including any informal request) that was served on the Company by any other party or intervenor. Please provide such response or objection whenever it is provided or amended. If any such response or objection has already been provided to any other party or intervenor, please provide that response or objection as part of the Company's response to that request. Where available, please provide copies electronically in their native file format. This is an on-going request.

Respectfully submitted this 9th day of September, 2021.


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CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for Docket No. 2019-226-E and No. 2021-9-E, listed below, a copy of the Sierra Club's First Set of Data Requests via electronic mail on this day, September 9, 2021.

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